

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>JOSEPH THOMAS</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>TRANS UNION LLC and CINGULAR WIRELESS</p> <p style="text-align: right;">Defendant.</p>	<p>C.A. NO: 02-CV-4586</p>
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JOINT MOTION FOR EXTENSION OF TIME

Trans Union LLC (“Trans Union”), and Ramona Erazo (“Plaintiff”) (collectively referred to as the “Parties”), by and through their undersigned attorneys, jointly move for an extension of time of all deadlines for sixty (60) days.

1. Plaintiff has commenced this action alleging that Defendant Trans Union violated the Fair Credit Reporting Act, 15 U.S.C. §1681 *et seq.* (the “FCRA”) because it reported certain allegedly inaccurate credit information relating to Plaintiff.

2. The Parties have engaged in serious settlement discussions. Cingular and Plaintiff have settled.

3. The Parties have requested a settlement conference with the Magistrate Judge. No date for this conference has yet been set. The Parties do have some remaining discovery to complete, including depositions.

4. Summary Judgment motions are due Thursday, March 27, 2003. This matter is scheduled to enter the trial pool on April 14, 2003. If the Parties are required to incur the time and expense of motions, depositions and pretrial preparation, this would diminish the prospect of settlement.

5. Accordingly, the Parties respectfully requests that the Scheduling Order be modified to extend all existing deadlines for sixty (60) days.

WHEREFORE, the Parties jointly respectfully request that this Court grant an extension of time of all existing deadlines for sixty (60) days.

Respectfully Submitted this 25th day of March , 2003.

By/S/TPC w/ express permission

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